

The Michaelson Law Firm

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March 17, 2011

FEDERAL EXPRESS and ELECTRONIC MAIL

Cynthia Haffey
Butzel Long
Suite 100
150 West Jefferson Ave.
Detroit, Michigan 48226

**Re: Delphi Automotive Systems, LLC v. Philips Semiconductors, Inc. (n/k/a)
NXP Semiconductors USA, Inc. (Adv. Pro. No. 07-02580)**

Dear Ms. Haffey:

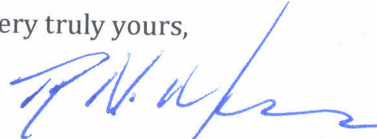
I am writing to express my frustration with your failure to respond to my e-mails to you of February 22, 2011, and March 2, 2011, following up on our telephone conversation of January 13, 2011, in which we discussed the "assumed contract" defense of my client, NXP Semiconductors USA, Inc., in connection with the above-referenced adversary proceeding.

As you know, our January 13th conversation was mandated by Judge Drain's December, 2010, directive that plaintiff's counsel engage in discussions with defendants in the Delphi preference litigation asserting an "assumed contract" defense in order to determine whether any such defenses were meritorious. I believe that I presented you with a persuasive argument that NXP's "assumed contract" defense was meritorious and we concluded our conversation with a promise from you to get back to me with a response, though you did indicate it might not be for a few weeks. When I had not heard from you by February 22nd I sent you an e-mail asking when I might expect your response. That e-mail was never answered. I sent a similar e-mail on March 2nd and that e-mail was also not answered.

Absent a reasonable explanation from you as to why you have not provided me with your promised response to our January 13th conversation or to my subsequent e-mails, I am forced to conclude that you are intentionally ignoring Judge Drain's directive and are not negotiating in good faith. I intend to advise Judge Drain of this fact but before I do so I want to provide you with an opportunity to respond.

I look forward to your prompt response.

Very truly yours,



Robert N. Michaelson